

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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REBECCA TERRY,

Plaintiff,

v.

Case No. 17-CV-1112

COUNTY OF MILWAUKEE, *et al.*,

Defendants.

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**DECLARATION OF DOUGLAS S. KNOTT IN SUPPORT OF MILWAUKEE COUNTY  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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STATE OF WISCONSIN     )  
                                      ) ss:  
MILWAUKEE COUNTY     )

I, Douglas S. Knott, declare as follows pursuant to 28 U.S.C. § 1746:

1.     That I am one of the attorneys of record for Defendants Milwaukee County, Richard Schmidt, Brian Wenzel, Carolyn Exum, Morgan Bevenue, and Margaret Hoover (the "County Defendants").

2.     I make this Declaration upon personal knowledge and in support of County Defendants' Motion for Summary Judgment.

3.     Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's June 2010 Milwaukee County Sheriff felony charge.

4.     Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff's May 2011 Milwaukee County Sheriff felony charge.

5.     Attached hereto as Exhibit 3 is a true and correct copy of Plaintiff's August 2013 Milwaukee County Sheriff felony charge.

6. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff's August 2013 Milwaukee County Jail medical records.

7. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff's October 2013 Milwaukee County Sheriff felony charge.

8. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff's November 2013 Milwaukee County Sheriff felony charge.

9. Attached hereto as Exhibit 7 is a true and correct copy of a Franklin Municipal Court Order signed by Judge Frederick F. Klimetz.

10. Attached hereto as Exhibit 8 is a true and correct copy of the Franklin Police Department Incident Report dated March 9, 2014 regarding Plaintiff.

11. Attached hereto as Exhibit 9 is a true and correct copy of the deposition transcript of Rebecca Terry dated June 1, 2018.

12. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiff's March 9, 2014 Milwaukee County Jail medical records.

13. Attached hereto as Exhibit 11 is a true and correct copy of Plaintiff's March 10, 2014 Froedtert Hospital medical records.

14. Attached hereto as Exhibit 12 is a true and correct copy of Plaintiff's March 10, 2014 Milwaukee County Jail medical records.

15. Attached hereto as Exhibit 13 is a true and correct copy of the deposition transcript of Carolyn Exum dated March 19, 2018.

16. Attached hereto as Exhibit 14 is a true and correct copy of the deposition transcript of Gina Buono MD dated April 25, 2018.

17. Attached hereto as Exhibit 15 is a true and correct copy of the deposition transcript of Margaret Ann Hoover dated April 30, 2018.

18. Attached hereto as Exhibit 16 is a true and correct copy of a Milwaukee County Jail nursing Shift Supervisor job description dated March 26, 2012.

19. Attached hereto as Exhibit 17 is a true and correct copy of the deposition transcript of Morgan Bevenue dated June 21, 2018.

20. Attached hereto as Exhibit 18 is a true and correct copy of the Milwaukee County Sheriff's Office Incident Report by Brian Wenzel dated March 10, 2014.

21. Attached hereto as Exhibit 19 is a true and correct copy of Morgan Bevenue's Supplemental Response to Plaintiff's Interrogatories dated June 21, 2018.

22. Attached hereto as Exhibit 20 is a true and correct copy of the Milwaukee County Jail Special Medical Unit (SMU) Jail Log dated March 9-10, 2014.

23. Attached hereto as Exhibit 21 is a true and correct copy of the deposition transcript of Brian Wenzel dated March 27, 2018.

24. Attached hereto as Exhibit 22 is a true and correct copy of the Declaration of Decorie Smith dated June 7, 2018.

25. Attached hereto as Exhibit 23 is a true and correct copy of the deposition transcript of Crystalina Montano dated April 5, 2018.

26. Attached hereto as Exhibit 24 is a true and correct copy of the Milwaukee County Jail log from POD 5FC on March 10, 2014.

27. Attached hereto as Exhibit 25 is a true and correct copy of the Milwaukee Fire Department EMS Report dated March 10, 2014.

28. Attached hereto as Exhibit 26 is a true and correct copy of Plaintiff's Aurora Sinai Medical Center medical records from March 10-13, 2014.

29. Attached hereto as Exhibit 27 is a true and correct copy of Milwaukee County Jail Policy: Detention Bureau – Hospital Watch / Run OP 13, Rev. Date Jan. 1, 2008.

30. Attached hereto as Exhibit 28 is a true and correct copy of the relevant portions of the deposition transcript of former Inspector Edward Bailey dated May 30, 2017 from Case No. 14-CV-200.

31. Attached hereto as Exhibit 29 is the true and correct copy of a Milwaukee County Sheriff's Department Investigative Summary regarding a May 3, 2000 escape incident.

32. Attached hereto as Exhibit 30 is the true and correct copy of a Milwaukee County Sheriff's Office Incident Report regarding an April 17, 2008 escape incident.

33. Attached hereto as Exhibit 31 is the true and correct copy of a Milwaukee County Sheriff's Office Incident Report regarding an October 9, 2009 escape incident.

34. Attached hereto as Exhibit 32 is the true and correct copy of a Milwaukee County Sheriff's Office Incident Report regarding a January 8, 2011 escape incident.

35. Attached hereto as Exhibit 33 is the true and correct copy of a Milwaukee County Sheriff's Office Investigative Brief regarding a May 1, 2013 escape incident.

36. Attached hereto as Exhibit 34 is the true and correct copy of a Milwaukee County Sheriff's Office Investigative Summary regarding a November 27, 2014 escape incident.

37. Attached hereto as Exhibit 35 is the true and correct copy of an article entitled "Deputy Killed After Hospitalized Suspect Grabs His Gun" regarding an October 18, 2015 incident.

38. Attached hereto as Exhibit 36 is the true and correct copy of a Milwaukee County Sheriff's Office Investigative Summary regarding a May 7, 2016 escape incident.

39. Attached hereto as Exhibit 37 is the true and correct copy of an e-mail from Steven Haw dated March 10, 2014.

40. Attached hereto as Exhibit 38 is the true and correct copy of the Milwaukee County Jail handwritten log book from March 9-13, 2014.

41. Attached hereto as Exhibit 39 is a true and correct copy of Armor Policy J-E-02 "Receiving Screening."

42. Attached hereto as Exhibit 40 is a true and correct copy of Armor Policy J-E-08 "Emergency Services."

43. Attached hereto as Exhibit 41 is a true and correct copy of Armor Policy J-E-03 "Medical Housing Unit."

44. Attached hereto as Exhibit 42 is a true and correct copy of the Declaration of Brian Wenzel dated June 27, 2018.

45. Attached hereto as Exhibit 43 is a true and correct copy of the deposition transcript of Julie Shanahan dated April 17, 2018.

46. Attached hereto as Exhibit 44 is a true and correct copy of the relevant portions of the deposition transcript of Amika Avery dated April 5, 2018.

47. Attached hereto as Exhibit 45 is a true and correct copy of the deposition transcript of Dashyla Elliot dated April 24, 2018.

48. Attached hereto as Exhibit 46 is a true and correct copy of Court Record, Milwaukee County Case No. 2013-CV-3503.

49. Attached hereto as Exhibit 47 is a true and correct copy of the deposition transcript of Elizabeth Freuck dated August 21, 2018.

50. Attached hereto as Exhibit 48 is a true and correct copy of Plaintiff's Second Supplemental Responses to The Milwaukee County Defendants' First Set of Interrogatories dated August 9, 2018.

51. Attached hereto as Exhibit 49 is a true and correct copy of the Milwaukee County Jail Policy: Detention Bureau – Inmate Transportation OP 5, Rev. Date July 2, 2008.

52. Attached hereto as Exhibit 50 is a true and correct copy of the Declaration of Debra Burmeister dated 8/31/18.

53. Attached hereto as Exhibit 51 is a true and correct copy of James D. Dolan, MD's expert report dated June 25, 2018.

54. Attached hereto as Exhibit 52 is a true and correct copy of the Report on Settlement Agreement in the Christensen Case, Milwaukee County Jail and the House of Corrections (July-Aug. 2013) submitted by R. Shansky, MD.

55. Attached hereto as Exhibit 53 is a true and correct copy of the Report on Settlement Agreement in the Christensen Case, Milwaukee County Jail and the House of Corrections (Dec. 2-6, 2013) submitted by R. Shansky, MD.

56. Attached hereto as Exhibit 54 is a true and correct copy of the deposition transcript of Gina Strehlow dated April 4, 2018.

Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 31<sup>st</sup> day of August, 2018.

/s/ Douglas S. Knott